

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

ENDEAVOR MESHTECH, INC.,

Plaintiff,

v.

RAJANT CORPORATION

Defendant.

CIVIL ACTION NO. 2:16-cv-00013-MAK  
**JURY TRIAL DEMANDED**

**STIPULATION TO EXTEND ANSWER DEADLINE**

Plaintiff Endeavor MeshTech, Inc. (“Endeavor”) and Rajant Corporation (“Rajant”) have stipulated to a 30-day extension of time, up and until March 14, 2016, for Rajant to respond or answer the Complaint. In support of this stipulation, Endeavor states:

1. Plaintiff filed the Complaint on January 4, 2016, and served on Rajant on January 22, 2016. Dkt. #1.
2. The current deadline for Rajant to answer or otherwise respond to the Complaint is February 12, 2016.
3. Rajant has not yet retained outside counsel and is working with Plaintiff to attempt to resolve the litigation without the need for hiring outside counsel. Endeavor and Charles O’Neill, Rajant’s Special Counsel, are making progress in this regard but need additional time to reach a resolution.

4. Rajant and Endeavor agree that a 30-day extension of time to answer or respond to the Complaint, up and until March 14, 2016, would prove useful in reaching a resolution in this matter.
5. Accordingly, Endeavor respectfully requests that Rajant be granted a 30-day extension, up and until March 14, 2016, to file a response or answer to the Complaint.
6. Both Endeavor and Rajant have agreed to this extension.
7. This request is made in good faith and not in an attempt to unduly delay proceedings.

APPROVED, this \_\_\_\_ day of February, 2016

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Hon. Mark A. Kearney  
United States District Judge

Dated: February 2, 2016

Respectfully submitted,

/s/Julie E. Chovanes

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*Attorneys for Plaintiff*  
*Endeavor MeshTech, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify on this day that I had the foregoing document electronically filed with the Clerk of Court using the CM/ECF system. Additionally, on this day I will email a copy of the file stamped version of this stipulation to Charles O'Neill, Rajant's Special Counsel.

DATED: February 2, 2016.

/s/James F. McDonough, III

James F. McDonough, III (Bar No. 117088, GA)

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